

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	1:18-cr-73
v.)	
)	Hon. Claude M. Hilton
ZAKARIA TAOUFIK)	
a/k/a "Zakaria Tadufik,")	Trial: September 11, 2018
a/k/a "Zakaria Taoueik,")	
a/k/a "Zakaria Amare,")	
)	
Defendant.)	

STIPULATIONS FOR TRIAL

The United States, the defendant, Zakaria Taoufik, and counsel for the defendant stipulate and agree as follows:

1. The defendant is an alien. He is a citizen and national of Morocco. He is not now and never was a citizen or national of the United States.
2. At all times relevant to the Superseding Indictment, a final and valid order of removal was outstanding against the Defendant by reason of his membership in one of the classes described in Title 8, United States Code, Section 1227(a), namely he had a qualifying criminal conviction.
3. At all times relevant to the Superseding Indictment, U.S. Immigration and Customs Enforcement (ICE) Officers Jeremy Thompson, Michael Donato, and Bjorn Cupid were each officers or employees of the United States, and were thereby "persons designated in Title 18, United States Code, Section 1114," within the meaning of 18 U.S.C. § 111(a).

4. At all times relevant to the Superseding Indictment, ICE Officers Jeremy Thompson, Michael Donato, and Bjorn Cupid were engaged in the performance of official duties.

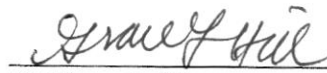
5. Dulles International Airport is within the Eastern District of Virginia.

6. Government Exhibits 2A – 2I are excerpts from the Defendant's certified A-File.


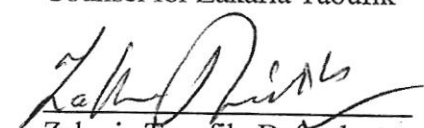
These exhibits are authentic and admissible pursuant to Federal Rule of Evidence 803. The Defendant does not object to their admission.

WE ASK FOR THIS:

G. Zachary Terwilliger
United States Attorney


Matthew Reilly
Special Assistant U.S. Attorney
Grace L. Hill
Assistant United States Attorney

SEEN AND AGREED:


Jeffrey Zimmerman
Counsel for Zakaria Taoufik

Zakaria Taoufik, Defendant